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COUNSEL/PARTIES	
<div style="border: 2px solid black; padding: 5px; margin: 5px auto; width: 150px;"> APR 12 2022 </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPT:

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AYELE JAH'NE HOLMES,

Defendant.

**SEALED
CRIMINAL INDICTMENT**

Case No. *2L22-cr-00079 APG EJY*

VIOLATIONS:

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –
Illegal Acquisition of a Firearm (Five Counts)

THE GRAND JURY CHARGES THAT:

COUNTS ONE, TWO, THREE, FOUR, AND FIVE

False Statement During Purchase of a Firearm
(18 U.S.C. §§ 922(a)(6) and 924(a)(2))

On or about the dates below, in the State and Federal District of Nevada,

AYELE JAH'NE HOLMES,

defendant herein, in connection with, as described below, the acquisition of firearms from licensed dealers of firearms within the meaning of Chapter 44 of Title 18, United States Code (the "FFLs"), knowingly made and caused to be made a false and fictitious written statement to each of the FFLs, which statements were intended and likely to deceive each of the FFLs

as to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, United States Code, in that HOLMES did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein HOLMES represented that she was the actual transferee/buyer of the firearms, when in fact, and as the defendant well knew, she was not the actual transferee/buyer of the firearms and was buying them for another person.

COUNT	DATE	DEALER (FEDERAL FIREARMS LICENSEE)	FIREARMS
ONE	10/28/2020	Briarhawk Firearms & Ammunition	(1) SCCY CPX-2, 9mm semi-automatic pistols, bearing serial number C031565; (2) SCCY CPX-2, 9mm semi-automatic pistols, bearing serial number C021889; (3) SAR ST9, 9mm semi-automatic pistol, bearing serial number T1102-20AC52029; (4) Tisas Zigana PX-9, 9mm semi-automatic pistol, bearing serial number T0620-20BM09401; and (5) SAR SAR9T, 9mm semi-automatic pistol, bearing serial number T1102-20CC50170.
TWO	11/07/2020	Briarhawk Firearms & Ammunition	(1) Springfield XDM Elite, 9mm semi-automatic pistol, bearing serial number BY418034; (2) Glock 19, 9mm semi-automatic pistol, bearing serial number BRFP793; (3) Glock 45, 9mm semi-automatic pistol, bearing serial number BRKR878; (4) Taurus G2C, 9mm semi-automatic pistol, bearing serial number ABK016482; (5) Ruger Security 9, 9mm semi-automatic pistol, bearing serial number 383-73778; (6) Armscor M200, 38 special, semi-automatic pistol,

COUNT	DATE	DEALER (FEDERAL FIREARMS LICENSEE)	FIREARMS
			bearing serial number RIA2243307; (7) Armscor M200, 38 special, semi-automatic pistol, bearing serial number RIA2243313; (8) Smith & Wesson M&P 15 Sport II, 5.56 semi-automatic rifle, bearing serial number TP91981; (9) Tisas Zigana PX-9m, 9mm semi-automatic pistol, bearing serial number T0620-20BM09409; and (10) Ruger American, 9mm semi-automatic pistol, bearing serial number 861-53455.
THREE	11/20/2020	Briarhawk Firearms & Ammunition	(1) Tisas Zigana PX-9, 9mm semi-automatic pistol, bearing serial number T0620-20BM09611.
FOUR	12/11/2020	Briarhawk Firearms & Ammunition	(1) SCCY CPX, 9mm semi-automatic pistol, bearing serial number C060496; and (2) Diamondback DB9, 9mm semi-automatic pistol, bearing serial number YL5880.
FIVE	01/14/2021	Briarhawk Firearms & Ammunition	(1) Taurus G3, .22 LR semi-automatic pistol, bearing serial number ABN361542.

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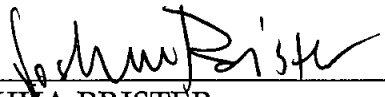
1 All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

2 **DATED:** this 12th day of April, 2022.

3 **A TRUE BILL:**

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5 /S/
6 FOREPERSON OF THE GRAND JURY

7 CHRISTOPHER CHIOU
8 Acting United States Attorney

9 By 
10 JOSHUA BRISTER
11 Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA
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